

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

FEB 12 2018

David J. Bradley, Clerk of Court

United States of America  
v.  
Oluseyi Jeremiah Olagoke Adebayo  
a.k.a.  
Jeremiah Adebayo Oluyesi

Case No.

H18-0164M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 7, 2018 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 1543	Forgery or False Use of Passport
18 U.S.C. 1028A	Aggravated Identity Theft

This criminal complaint is based on these facts:

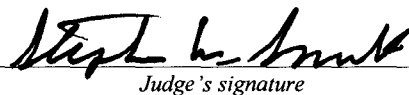
See Attached Affidavit.

☒ Continued on the attached sheet.


Complainant's signature

A.V. SHADOWENS, US Postal Inspector  
Printed name and title

Sworn to before me and signed in my presence.

Date: February 12, 2018City and state: Houston, Texas


Judge's signature

USMS Stephen L. Smith  
Printed name and title

## AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, A.K. Shadowens, being duly sworn, hereby state the following:

1. Your Affiant, A.K. Shadowens, is employed as a federal law enforcement officer by the United States Postal Inspection Service. Your Affiant has been employed as a federal law enforcement officer since 2013 and is assigned to the Financial Crimes team in the Houston Division of the United States Postal Inspection Service. Your Affiant is responsible for conducting investigations into identity theft including, but not limited to, fraudulent applications and false statements to obtain property or credit, bank fraud, wire fraud, mail fraud, and account takeovers. Since being employed as a Postal Inspector, Affiant has conducted investigations and assisted other Postal Inspectors and law enforcement agents in investigating identity theft including fraudulent applications and account takeovers.
2. The information contained within this Affidavit is based upon information your Affiant has gained from his investigation, personal observations, training and experience, and/or information provided to your Affiant by other Postal Inspectors, law enforcement officers and/or agents, and fraud investigators.
3. This Affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this Affidavit are related in substance and in part only.
4. Affiant solemnly swears and has reason to believe and does believe that **OLUSEYI JEREMIAH OLAGOKE ADEBAYO a.k.a. JEREMIAH ADEBAYO OLUYESI**, African-American male, date of birth April 12, 1974 (hereinafter referred to as "**DEFENDANT**") did on or about February 7, 2018 in Harris County, in the Southern District of Texas falsely make, forge, counterfeit, mutilate or alter a passport with intent that the same be used, and did during and in relation to the felony offense of Fraud in Connection with Major Disaster or Emergency Benefits knowingly possess and use, without lawful authority, a means of identification of another person, in violation of Title 18, United States Code, Sections 1543 and 1028A.
5. On or about January 24, 2018, Affiant was contacted by Special Agent Chris Ray, a person Affiant knows to be employed as a federal law enforcement officer with the Small Business Administration Office of Inspector General and a person Affiant finds to be reliable and credible. S.A. Ray reported to Affiant that he had been conducting a criminal investigation into disaster relief fraud and had learned the following as part of his investigation:
  - a. On or about October 9, 2017, an application for a Disaster Home Loan was received by the Small Business Administration (hereinafter referred to as "SBA")

using the personal identifying information including, but not limited to, name, address, date of birth, and Social Security Number of Complainant **JOHN MARK CROSSMAN** for property damage located at 4412 Anson Ln, Orlando, FL 32814. The electronic loan application filed had several fraud indicators including, but not limited to, a proxy IP address that had been identified by the SBA as being linked to the submission of additional fraudulent disaster loan applications, and several misspelled words. Affiant knows from training and experience as a proxy IP address may be suspicious in nature as it allows the true IP address to be concealed and allows a device user to conduct actions on the internet anonymously.

- b. On or about October 19, 2017, an individual claiming to be **CROSSMAN** called the SBA to inquire about the status of his application. SBA told the individual that the loan would be approved and he would need to send in closing documents. The individual said he would send them in and then call to confirm their receipt.
- c. On or about November 16 or 17, 2017, an individual claiming to be **CROSSMAN** requested that the loan closing documents be sent to a different address than the damaged property address. Specifically, the impostor requested the documents be sent to:

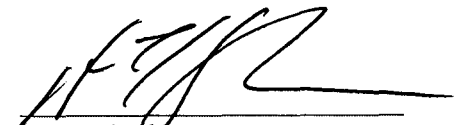
15255 Gray Ridge Dr., Apt. 915  
Houston, TX 77082

- d. On or about January 26, 2018, the SBA received the loan closing documents via the United States Mail. The envelope in which the loan closing documents were mailed was reviewed and found to contain the following return address:

Angela Crossman  
15255 Gray Ridge Drive #915  
Houston, TX 77082

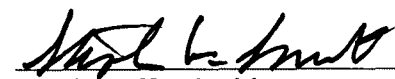
- e. On or about January 31, 2018, SBA spoke with an individual claiming to be **CROSSMAN** to confirm receipt of the loan closing documents including a copy of a Florida Driver's License in the name of **JOHN MARK CROSSMAN** and a notarized affidavit certifying that the loan information was true and correct signed by an individual(s) impersonating **CROSSMAN** and **ANGELA CROSSMAN**.
- f. The individual impersonating **CROSSMAN** contacted the SBA and requested that loan disbursements be sent to the address of 15255 Gray Ridge Dr., Apt. 915, Houston, TX 77085. An SBA Representative advised the impostor **CROSSMAN** was told he would have to show ID and sign for the certified letter.
- g. The SBA has contacted the true Complainant Crossman who has confirmed he did not apply for the above-referenced loan and did not give anyone authorization to utilize his personal identifying information to apply for the above-referenced loan.

6. On or about February 6, 2018, Affiant, SA Ray, and other law enforcement officers attempted to conduct a controlled delivery of a fake loan disbursement check at the address of 15255 Gray Ridge Dr., Apt. 915, Houston, TX 77085. The delivery of the check was refused by the current occupant of that apartment.
7. On or about February 6, 2018, an individual impersonating Complainant Crossman contacted the SBA to inquire about delivery of the loan disbursement check. The impostor was advised that delivery had been attempted but was refused. The impostor requested that delivery be re-attempted the following day.
8. On or about February 7, 2018, SA Ray, posing as a U.S. Letter Carrier, contacted the impostor via telephone regarding delivery of the loan disbursement check. The impostor advised SA Ray that there was nobody present at the residence to sign for delivery of the check, and requested that the check be made available for pick up at the local Post Office.
9. On or about February 7, 2018, **DEFENDANT** appeared at the U.S. Post Office located at 12655 Whittington Drive, Houston, Texas 77077. **DEFENDANT** approached U.S. Postal Service employee P. Kim. Kim advised Affiant that **DEFENDANT** identified himself as **CROSSMAN** and presented a South African passport bearing the name of **CROSSMAN**, but the image of **DEFENDANT**, as identification. Kim delivered the loan disbursement check to **DEFENDANT**, which he signed for as **CROSSMAN**. After **DEFENDANT** took possession of the loan disbursement check he was taken into custody by Affiant, SA Ray, and other law enforcement officers. **DEFENDANT** was found to be in possession of the above-described counterfeit South African passport, which was further found to contain a counterfeit U.S. Visa in the name of **CROSSMAN**. **DEFENDANT** was further found to be in possession of two debit cards bearing the name David Miles.
10. Based upon the above, the undersigned believes there is probable cause that **OLUSEYI JEREMIAH OLAGOKE ADEBAYO a.k.a. JEREMIAH ADEBAYO OLUYESI** has committed crimes in violation of Title 18, United States Code, Sections 1543 (Forgery or False Use of Passport) and 1028A (Aggravated Identity Theft).



A.K. Shadowens  
United States Postal Inspector

Sworn and Subscribed to me this 12<sup>th</sup> day of February, 2018 and I find probable cause.



Stephen Wm Smith  
United States Magistrate  
Southern District of Texas